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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CR No. 08-0025 WHA
	)	
Plaintiff,	)	STIPULATION AND [PROPOSED] ORDER
	)	CONTINUING CHANGE OF PLEA / TRIAL
v.	)	SETTING DATE
	)	
REMSEN BENEDICT,	)	
	)	
Defendant.	)	

This matter is currently scheduled for Change of Plea / Trial Setting before this Court on Tuesday, June 24, 2008. Due to technical and scheduling difficulties, counsel for the defendant has not yet reviewed and intends to begin reviewing the images at issue in this case next week. This case involves a large number of images and the review may take several days to complete. In addition, although the parties have commenced plea negotiations, defense counsel needs to review the images before completing these negotiations. Mindful of the need to proceed expeditiously, the parties seek a short continuance until July 8, 2008 to permit defense counsel to review the images and for counsel to engage in meaningful plea negotiations. The parties agree that time is properly excluded under the Speedy Trial Act for continuity and effective

1 preparation of counsel. 18 U.S.C. §§ 3161(h)(8)(A) and 3161(h)(8)(B)(iv).

2  
3 SO STIPULATED:

4  
5 JOSEPH P. RUSSONIELLO  
6 United States Attorney

7 DATED: June 19, 2008

8 /s/  
9 DENISE MARIE BARTON  
Assistant United States Attorney

10 DATED: June 19, 2008

11 /s/  
12 GEORGE C. BOISSEAU  
13 GEOFFREY DUNHAM  
Attorney for REMSEN BENEDICT

14 For the foregoing reasons, this matter is continued until July 8, 2008 and set for Change of  
15 Plea / Trial Setting. Pursuant to the Speedy Trial Act, Title 18 United States Code, sections  
16 3161(h)(8)(A) and 3161(h)(8)(B)(iv), the ends of justice are served by granting the requested  
17 continuance, given that failure to do so would deny the parties continuity of counsel and  
18 reasonable time for effective preparation, taking into account the exercise of due diligence.  
19 Accordingly, time shall be excluded from June 24, 2008 through July 8, 2008.

20  
21 SO ORDERED.

22  
23 DATED: \_\_\_\_\_

24 HON. WILLIAM H. ALSUP  
United States District Court Judge